

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiffs,

vs.

SARAH STROMMEN *in her official
capacity as Commissioner of the Department
of natural Resources,*

Defendant,

and

Minnesota Trappers Association, National
Trappers Association, and Fur Takers
America, Inc.,

Applicant Defendant
Intervenors.

Case No. 20-CV-2554 (ECT/JFD)

MOTION TO INTERVENE

Pursuant to Fed. R. Civ. P. 24, the Minnesota Trappers Association, National Trappers Association, and Fur Takers America, Inc. (collectively “Applicant Intervenors” or “Trapping Intervenors”) respectfully move to intervene in the above-captioned case. The existing party, Plaintiff, Center for Biological Diversity have indicated by email to counsel that the Center does not oppose intervention of the trapping associations on the condition that the Court requires

adherence to the existing scheduling order issued in this case. Defendant¹, through its counsel, does not oppose this motion. As set forth in the separately filed brief in support of this motion, intervention is sought under both Rule 24(a) and (b). Intervention is appropriate because (1) the motion is timely, (2) restricting trapping in Minnesota as requested by Plaintiffs would by definition have a significant adverse impact on the Trapping Intervenors, as their rights and the rights of their members to trap in Minnesota would be restricted, and (3) the State Defendants as the regulator of trapping in Minnesota does not adequately represent the interests of the Trapping Intervenors, who are the regulated parties.

Dated: February 18, 2022

Respectfully submitted,

RINKE NOONAN, LTD.

/s/Gary R. Leistico

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ATTORNEY FOR INTERVENOR

APPLICANTS MINNESOTA TRAPPERS

ASSOCIATION, NATIONAL TRAPPERS

ASSOCIATION, FUR TAKERS AMERICA, INC.

¹ The State Defendant is Sarah Strommen, in her official capacity as Commissioner of the Department of natural Resources.